MORRIS, NICHOLS, ARSHT & TUNNELL LLP

1201 NORTH MARKET STREET
P.O. BOX 1347
WILMINGTON, DELAWARE 19899-1347

_____

(302) 658-9200
(302) 658-3989 FAX

JENNIFER YING
(302) 351-9243
(302) 225-2570 FAX
jying@morrisnichols.com

January 24, 2025

The Honorable Gregory B. Williams   *VIA ELECTRONIC FILING*
United States District Court
  for the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801-3555

>   Re: *Cisco Sys., Inc. and Acacia Comm'ns, Inc. v. Ramot at Tel Aviv Univ. Ltd.,*
>   C.A. Nos. 21-1365; 22-674 (GBW)

Dear Judge Williams:

Declaratory-judgment plaintiffs Cisco Systems, Inc. and Acacia Communications, Inc. (collectively, "Cisco") respectfully submit this letter in response to defendant-patentee Ramot at Tel Aviv University Ltd. ("Ramot")'s letter and revised proposed order filed earlier today (*see* C.A. No. 21-1365, D.I. 179; C.A. No. 22-674, D.I. 168).

As an initial matter, Ramot never told Cisco that it would be filing such a letter and revised proposed order. To the contrary, Ramot wrote to Cisco about apparently related discovery issues in an email yesterday evening, but did not suggest it would approach the Court before receiving a response from Cisco (and certainly did not share its letter or revised proposed order with Cisco before unilaterally filing it with it with the Court this afternoon).

Cisco further notes that Ramot's revised proposed order would inject specific new issues into an already-briefed motion, and they are specific issues for which the parties have not completed a meet and confer and that have not been the subject of any briefing before the Court. To the extent the Court is inclined to consider Ramot's new submission, Cisco respectfully requests an opportunity to be heard.

Counsel is available should the Court have any questions.

The Honorable Gregory B. Williams
January 24, 2025
Page 2

Respectfully,

/s/ Jennifer Ying

Jennifer Ying (#5550)

JY/lo
cc: Clerk of the Court (via hand delivery)
       All Counsel of Record (via CM/ECF and e-mail)